

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BENARD L MADOFF,
Debtor.

Adv. Pro. No 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Date and Time of Hearing:

Courtroom 723

April 25, 2018 at 10:00 AM

Table of Contents, Headings and a Table of Authorities

Table of Contents

1	Written Oral Arguments by Objectant Dean Loren, Executor of the Evelyn Goldberg Estate	1-4
2	Judicious Caveat: <i>Freedom from Obstruction</i> of Justice by Laws <i>Misapplied</i> Insures Justice by Laws <i>Correctly Applied</i> .™	A1-A4
3	Objectant's Sworn Affidavit dated Apr 23, 2018 without its attachments.	E1-E4
4	Attorney Lalit K Jain's Notice of Appearance	-

Headings

A	Opening Statements	1
B	Legal Arguments	2
C	Closing Arguments	3
-	Endnotes a to c	4

Table of Authorities

In Endnotes of Written Oral Arguments by Objectant Dean Loren		Page
a	LKJESQ asks for a chance to correct inadvertent error(s) made and perfect his filing.	1
b	<i>Meinhard v Salmon</i> , 1928, NYS Ct App, CJ Cardozo , 249 NY 458, 463-464.	1
c	NY CPLR §3101. Scope of disclosure.	1
In Endnotes of LKJESQ Judicious Caveat		
1	SCOTUS Rule 10, Considerations Governing Review of Certiorari.	A1
2	<i>A Matter of Interpretation, Federal Courts and the Law</i> , p6 and p9, 1997 ed., by Justice Scalia.	A2
3	<i>Oregon v Hass</i> , 1975, 420 US 714, 722. <i>Judicia sunt tanquam juris dicta, et pro veritate accipiuntur. Bl Dict, 6th Ed, p 850.</i> <i>Judicia sunt tanquam juris dicta, et pro veritate accipiuntur. Bl Dict, 6th Ed, p 850.</i> <i>Knierim v Izzo</i> , 1961, 22 Ill 2d 73, 87-88, 174 NE2d 157	A3
4	Justice according to laws correctly read, interpreted and applied making correct judgments is right thus constitutional preventing, or else vacating as void, Obstruction of Justice .	A3
5	<i>W.E. Hedger Transp. Corp. v Ira S. Bushey & Sons</i> , 2nd Cir.1951, 186 F2d 236, 237.	A3
6	<i>People Ex Rel Karlin v Culkin</i> , 1928, Ct App, CJ Cardozo, 248 NY 465, 479-480. <i>Brown v Allen, Justice Jackson</i> , 1953, 344 US 443, 540.	A3
7	<i>Elliott v Lessee of Piersol</i> , 1828, 26 US (1 Pet.) 328, 340-341. <i>Pennoyer v Neff</i> , 1878, 95 US 714, 732-733. <i>World-Wide Volkswagen Corp. v Woodson</i> , 444 US 286. <i>Orner v Shalala</i> , Colo. 1994, 30 F3d 1307.	A3-A4
8	A predator is a predatory traditionalist enjoying territorial human rights to injure and/or exploit others... .. defined.	A4
9	<i>Riggs v Palmer</i> , 1889, 115 NY 506, 511. <i>Imperator Realty Co v Tull</i> , 1920, Cardozo , 228 NY 447, 457. <i>Zepeda v Zepeda</i> , 1963, 41 Ill App2d 240, 262-263.	A4
10	May It Please the Court... Transcripts of 23 Live Recordings of Landmark Cases before the Supreme Court Available to the Public for the First Time, Edited by Peter Irons and Stephanie Guitton 1993, pp 39-60 at pp 46-47. <i>DeShaney v Winnebago County</i> , 1989, 489 US 189.	A4

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BENARD L MADOFF,
Debtor.

Adv. Pro. No 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Date and Time of Hearing:
Courtroom 723
April 25, 2018 at 10:00 AM

Written Oral Arguments by Objectant Dean Loren, Executor of the Evelyn Goldberg Estate

1 With due respect to the Honorable Court, Trustee and Counsels in this *one-of-a-kind* case, Attorney Lalit K Jain of the Law Offices of Lalit K Jain Esq.^a retained by *Pro Se* Objectant *regrets* that everyone is forced to *read, understand and remember thousands of documents*, including the 4-pager *Judicious Caveat* marked A1-A4, duly filed to help the Court make Justice *prevent* Obstruction of Justice.

A Opening Statements

2 These written oral arguments to help prevent Judgmental Errors are required by laws *correctly read, interpreted and applied* since they are *intertwined thus inseparable fiduciary law^b* and *procedural law on the burden of proof of facts^c*, that too, in cases involving trusts and estates' *fiduciaries* with *unforgiving* legal, ethical, moral and other duties *despite conflicting contractual duties* to others.

3 These written oral arguments are required help *prevent* due process of law for equal protection of the laws from being *misused and defiled* to make Courts *sacred sanctuaries* for victimizers, violators and injurers as the predators for *law-breaking news* but not their victims, violateds and injureds as their prey for *law-obeying news*. They also *help everyone save time and money, no ifs, ands or buts*.

B Legal Arguments

4 On Feb 22, 2018, Hon Irving H. Picard filed Trustee's Response (ECF No. 17276) to the *Pro Se* Motion of Objectant Dean Loren filed Jan 24, 2018 (ECF No. 17160).

5 As a matter of law and fact, this Federal litigation is *one-of-a-kind* with *three fiduciaries*. It involves *intertwined thus inseparable fiduciary* Dean Loren of the Evelyn Goldberg Estate with Counsel Lalit K Jain, *fiduciary* David Mandelbaum of the Simon Goldberg Estate with Counsel Wolf Popper LLP by John Fisher, and *fiduciary* Irving H Picard as Trustee of the Debtor by David J Sheehan.

6 As "there is no exception for "excusable neglect" in a SIPA proceeding ..." (Trustee's Response, page 9, ¶ 24), so Honorable Court's Decision and Order requiring Trustee's Counsel *to please cooperate with* Objectant's Counsel to help prevent any neglect of any kind in marshalling every asset owned by the Debtor *since even now* Trustee *has no basis to claim* that marshalling is 100% complete.

7 In due course of marshalling every asset for the Estate of Evelyn Goldberg Estate from the Simon Goldberg Estate (Evelyn married Simon in 1958 and is now his widow since May 24, 1985), Objectant received from Counsel Fisher an *initial accounting* of its assets from 1985 through 1992, *first supplemental accounting* of its assets from 1993-Oct 31, 1995, and *second supplemental accounting* of its assets from Jan 1, 1993 to Nov 11, 2008. In the "Light Switch" Accountings of 1992-1995, *unaccounted assets were declared* and in Nov 2015 *additional unaccounted assets* were declared *with no end in sight*.

8 The foregoing accountings include, but are not limited to, the US and Canadian Treasury Bonds *without revealing* if they were brought and/or sold using Madoff.

9 The April 26, 2017 Court ordered deposition of Madoff was a *first Godsend* for everyone.

C Closing Statements

10 It makes Court-ordered cooperation between Trustee's Counsel and Objectant's Counsel a *second Godsend* to help **prevent neglect in this SIPA proceeding**. It is supported by the following:

- .1 Objectant's Sworn Affidavit dated Apr 23, 2018 marked **E1-E4** without its attachments; and
- .2 *Judicious thus correct* use of Local Rule 7007-1(b) by Trustee's Counsel and Objectant's Counsel for *team work* to resolve disputes that are of no moment, to make good faith efforts to resolve disputes that are of moment under Local Rule 7007-1(a) and only then to make needed contacts with Chambers in writing to schedule needed conference(s), if any for lack of teamwork, to save time and money for all.

May it please the Court to please pass its judicious Decision and Order for *transparent integrity*:

- 1 To deny Trustee's request to deny Objectant's "Motion in its entirety" (Trustee's Response, page 11, CONCLUSION);
- 2 To grant "such additional and further relief as the Court deems just and fair" (Trustee's Response, page 11, CONCLUSION) but only if and when such additional and further relief are *in fact* just and fair like the Court-ordered cooperation between Trustee's Counsel and Objectant's Counsel legally required to help prevent neglect in this SIPA proceeding; and
- 3 Insure that every Officer of the Courts' **singular duty to the Court** to help prevent the Hon Court from making Judgmental errors as finality, knowing that only that finality does make Justice **help all** and thus *prevent* Obstruction of Justice **hurting all**.

Dated: New York, New York
Apr 24, 2018

Respectfully submitted,

/s/ Lalit K Jain

Lalit K Jain

Email: LKJESQ@LKJESQ.Com

Law Offices of Lalit K Jain Esq.

6122 Booth Street

Rego Park NY 113741034

Fon: 718 255-6576

Fax: 347 637-5498

Attorneys for Objectant Dean Loren

Honorable Stuart M Bernstein

(A *hard copy* of every pleading, with exhibits, to Chambers is to be provided at the time of service).

United States Bankruptcy Court

Southern District of New York

One Bowling Green

New York, NY 10004-1408

Tel: 212 284-4078

Chambers: 212 668-2304

Courtroom: 723

Courtroom Deputy: Chantel Barrett 212 284-4026

Law Clerk: Alexander Rich 212 284-4027

Law Clerk: Derek Cash 212 284-4028

Law Clerk: Mike Paek 212 284-4564

^a As this is his first ECF filing, so he asks for a chance to correct inadvertent error(s) made and perfect his filing.

^b “Joint adventurers, like copartners, owe to one another, while the enterprise continues, the duty of the finest loyalty. *Many forms of conduct permissible in a workaday world for those acting at arm's length, are forbidden to those bound by fiduciary ties [not defiled by lies compromising fiduciary duties]. A trustee is held to something stricter than the morals of the market place. Not honesty alone, but the punctilio of an honor the most sensitive, is then the standard of behavior. As to this there has developed a tradition that is unbending and inveterate.* Uncompromising rigidity has been the attitude of courts of equity when petitioned to undermine the rule of undivided loyalty by the “disintegrating erosion” of particular exceptions (Wendt v. Fischer, 243 N. Y. 439, 444). *Only thus has the level of conduct for fiduciaries been kept at a level higher than that trodden by the crowd. It will not consciously be lowered by any judgment of this court.”*

Meinhard v Salmon, 1928, NYS Ct App, CJ Cardozo, 249 NY 458, 463-464 [*Emp Added*].

^c “NY CPLR §3101. Scope of disclosure.

(a) Generally. There shall be **full disclosure of all matter material and necessary in the prosecution or defense of an action, regardless of the burden of proof**, by:

- (1) a party, or the officer, director, member, agent or employee of a party;
 - (2) a person who possessed a cause of action or defense asserted in the action;
 - (3) a person...authorized to practice medicine, dentistry or podiatry who has provided medical, dental or podiatric care or diagnosis to the party demanding disclosure, or who has been retained by such party as an expert witness; and
 - (4) any other person, upon notice stating the circumstances or reasons such disclosure is sought or required.
- (b) Privileged matter. Upon objection by a person entitled to assert the privilege, privileged matter shall not be obtainable **[except to the extent needed to make Justice prevent Obstruction of Justice]**.
- (c) Attorney's work product. The work product of an attorney shall not be obtainable **[except to the extent needed to make Justice prevent Obstruction of Justice]**. ***

LKJESQ

01.16.2018 Updated 04.21.2018	LAW OFFICES OF LALIT K JAIN ESQ Laws <i>correctly applied</i> instead of <i>misapplied</i> as constitutionally mandated™ Let all live in truth Knowing Justice always insures nature™	Fon: 718-255-6576 Cell: 718-316-5921 Fax: 347-637-5498
Practice of Law in NY State, US Tax and District Courts, US Supreme Court, and all Courts in India. Judicious Caveat: <i>Freedom from Obstruction of Justice by Laws Misapplied Insures Justice by Laws Correctly Applied.</i> ™		

The *therapeutic issue* before every Honorable Court is as follows:

Isn't it human to make con artists, errorists and terrorists pay their victims *therapeutic restitution* for rehabilitation and prevention of errors because to err is human, to forgive is divine but human never was, never will be, divine to forgive, *no ifs, ands or buts*?

May it please the Court to not act wrong with a *closed mind* immunizing injurers as Obstruction of Justice but act right with an *open mind* to make injurers pay *therapeutic restitution* as Justice?

Obstruction of Justice is to "conceal the truth"¹ by laws *misapplied* for *false* sense of security.² It *has to be voided* by "arriving at the truth"³ by laws *correctly applied* as Justice⁴ for *true* sense of security.⁵ Justice by *clean*⁶ *excuse-free* Courts⁷ *has to* make injurers pay *therapeutic restitution* to their injureds, *pay more* for *excuses misused* by predators⁸ *violating* laws against *unlawful gains*⁹ from *pleasurable assaults* like sexual assaults,¹⁰ *lexual* (legal), financial, ethical, moral, spiritual, political, constitutional and other assaults *promoted* by Obstruction of Justice as *unhuman* instead.

The oldest BIZZARO Corruptional Cartoon *dishonors* Honorable Courts *making the numbers add up wrong as proof* that IN GOD WE TRUST but IN FICTIONS WE BELIEVE to insure Obstruction of Justice causing *negative effects* for *law-breaking news* in *evil* social media.

Docketed 07.12.1996 Petition Denied
No. 96-57

IN THE
SUPREME COURT OF THE UNITED STATES
October Term, 1995

ANDREW C. SCHIFFER,
Petitioner,

vs.

TARRYTOWN BOAT CLUB, INC.,
and its BOARD OF DIRECTORS individually,
JOHN MILLAR, KEVIN McDERMOTT,
ROBERT ROSSI, EDWARD THOMAS,
DONALD BRAINARD, THOMAS KENEALY,
ANTHONY ISMAILOFF, and JOHN PUFF,
Respondents,

ON PETITION FOR A WRIT OF CERTIORARI
TO NEW YORK STATE COURT OF APPEALS

PETITION FOR A WRIT OF CERTIORARI

LALIT K. JAIN
Counsel of Record for Petitioner
61-22 Booth Street
Rego Park, N. Y. 11374-1034
718 476-9757

June 25, 1996

TWO UNSETTLING QUESTIONS

Judgments are, as it were, the sayings of the law,
and are received as truth [even if not the truth].*

Personally ashamed but constitutionally constrained by
oath to support our Constitutions WE THE PEOPLE still
honor, Counsel presents ~~very~~ basic questions raised by the
judicial truth as received and judicial satire as published.

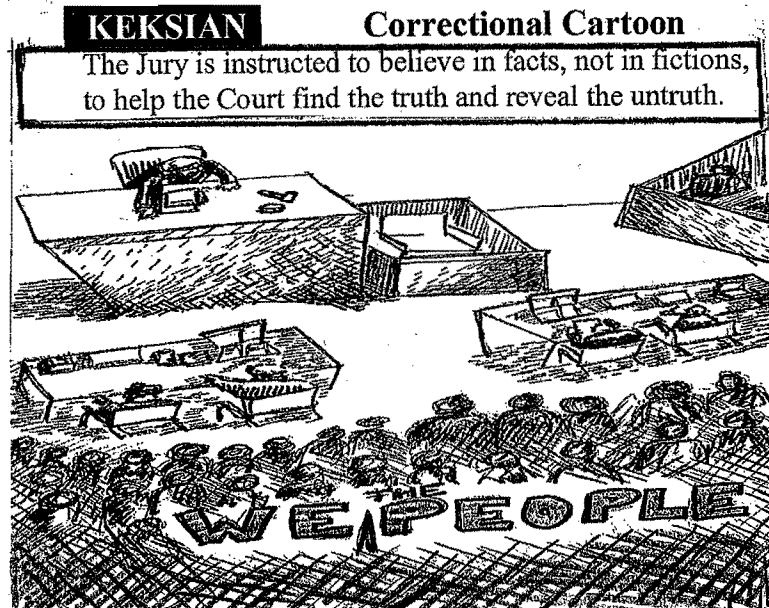
BIZZARO Corruptional Cartoon

* *Judicia sunt tanquam furis dicta, et pro veritate accipiuntur.*
Bl. Dict., (6th ed.), p. 850. (Emphatics added).

LKJESQ

Freedom from Obstruction of Justice by Laws Misapplied Means Justice by Laws Correctly Applied.™
01.16.2018 Updated 04.21.2018

The newest KEKSIAN Correctional Cartoon *honors the same* Honorable Courts *making the numbers add up right as proof* that IN GOD WE BELIEVE *thus* IN FICTIONS WE DON'T to insure Justice causing *positive effects* for *law-obeying news* in *good* social media.



Every Officer of the Courts' *same old singular loyalty* to the Honorable Court required the attorney at law aka LKJESQ to make *true, correct and complete disclosure* of the end of the common law tradition of *judicial bias* as the end of protecting the errorists. It is *irreversibly immortalized* in the Oct 31, 2013 25-page NYS Queens County Criminal Court Transcript of a bench trial in the criminal case of *People v Onuorah* aka Docket No. 2012QN040877.

"[p20]...THE COURT [*initially misjudged*]: ...I do find the defendant guilty...unless you [**Jain**] want to be heard... [p21] MR JAIN [*said*]: Yes... [p22]. THE COURT [*then ordered*]...Parties *step up real quick*. (Whereupon a bench discussion was held)...THE COURT [*had to be pleased to insure Justice by laws correctly applied preventing judicial conspiracy*] After re-examining the statute more closely and...as I reread it, many, many more times, *my initial reading of it was incorrect*...[p23]. ¶...I have to change my verdict [*of guilty insuring Obstruction of Justice as Ruthless Injustice by laws misapplied committing judicial conspiracy*] to not guilty [*verdict*]..." ¶ COURT OFFICER [*had to honor the framed motorist who was unconstitutionally prosecuted*]: You are free to go."

¹ "A petition for a writ of certiorari is *rarely granted* when the *asserted error* consists of *erroneous factual findings* or the *misapplication* of a *properly stated rule of law* [in thousands of cases filed every year for an Order to end the common law tradition of *judicial bias* insuring judicial conspiracy]." SCOTUS Rule 10, *Considerations Governing Review of Certiorari*.

² "...But if you think that it is terribly important that the case came out wrong, *you miss the point* of the [*Evil sold as Royal*] common law [tradition of lie to make the right to do wrong *end* the duty to do

LKJESQ

Freedom from Obstruction of Justice by Laws Misapplied Means Justice by Laws Correctly Applied. TM
01.16.2018 Updated 04.21.2018

right]. In the [evil] grand scheme of things, *whether the right party won is really secondary*. Famous old cases are famous, you see, not because they came out right, but because the rule of law [lie] they announced was the intelligent one [insuring Obstruction of Justice]...Common-law courts performed two [exact opposite good and evil] functions: One was to apply the law to the facts [as the good thus less important function to insure therapeutic restitution for rehabilitation as Justice]But the second function, and the more important one [as the evil one to deny such restitution as Obstruction of Justice] was to make [the predators' lie] the law [of the case on a case by case basis (at p.6)] ... and thus the common-law tradition [of judicial bias] is passed on...[to prevent evil governments *still dying to upgrade begin to upgrade* into good governments in *all* their forms since day one (at p.9)]...."

A Matter of Interpretation, Federal Courts and the Law, p6 and p9, 1997 ed., by Justice Scalia.

- ³ *Per se*, "arriving at the truth [insuring Justice] is a fundamental goal of our legal system" in *US v Havens*, 1980, 446 US 620, 626. *Per se*, "we are, after all, always engaged in a search for truth in a criminal case so long as the search is surrounded with the safeguards provided by our Constitution [against arriving at lies insuring Obstruction of Justice preventing Justice instead]."

Oregon v Hass, 1975, 420 US 714, 722.

"Judgments are, as it were, the sayings of the law [lie] ... received as truth [when they are the truth]." *Judicia sunt tanquam juris dicta, et pro veritate accipiuntur. Bl Dict*, 6th Ed, p 850.

"...the intense intellectual and emotional life which has come with the advance of civilization has made it clear that only a part of the pain, pleasure, and profit of life lies in physical things. ¶We conclude that *peace of mind [insuring Justice preventing Obstruction of Justice] is an interest of sufficient importance to receive protection from the law against intentional invasion of the kind here involved* ...The alleged conduct of the defendant in intentionally causing the severe emotional disturbance... *it is the outrageous nature of his conduct that forms the basis for the action.*"

Knierim v Izzo, 1961, 22 Ill 2d 73, 87-88, 174 NE2d 157.

- ⁴ Justice according to laws *correctly read, interpreted and applied making correct judgments* is right thus constitutional *preventing, or else vacating as void, Obstruction of Justice* according to laws *misread, misinterpreted and misapplied making misjudgments* as wrong thus unconstitutional.

- ⁵ "...where all the relevant facts are ...shown by the Court's own records [to make numbers add up right insuring Justice], of which it takes notice, there appears no good reason why an answer should be first required [to make numbers add up wrong insuring Obstruction of Injustice]...."

W.E. Hedger Transp. Corp. v Ira S. Bushey & Sons, 2nd Cir.1951, 186 F2d 236, 237.

- ⁶ "In so holding, we place power and responsibility where in reason they should be...*for the health and honor of the profession and for the protection of the public*...If the [unclean] house is to be cleaned, it is for those [jurists, lawyers, Officers of the Courts and other licensed and unlicensed forensic experts who occupy and govern it...[imposing on all law enforcement officers like Judges, Policemen, etc. the normal duty to never ever enforce Obstruction of Justice]."

People Ex Rel Karlin v Culklin, 1928, Ct App, CJ Cardozo, 248 NY 465, 479-480.

"We are not final because we are infallible, but we are infallible because we are final [errorists who violate the fundamental goal of our legal system to find the truth, misuse emotions to make mistakes to protect and reward predators and perjurers, and refuse to use evidence to make them pay restitution]."

Brown v Allen, Justice Jackson, 1953, 344 US 443, 540.

- ⁷ ... Where a court has jurisdiction, it has a right to decide every question which occurs in the cause, and whether its decision be correct [acting under the law thus with jurisdiction in law] or otherwise, its judgment [insuring Justice] is regarded as binding in every other court. But if it act [above the law

LKJESQ

Freedom from Obstruction of Justice by Laws Misapplied Means Justice by Laws Correctly Applied.™
01.16.2018 Updated 04.21.2018

thus *without jurisdiction in law*], its judgments and orders [**insuring Obstruction of Justice**] are regarded as nullities [“(Nullities”)]. They are not voidable [*waiting to be voided*], but simply void...*even prior to a reversal*. ...all persons concerned in executing such [**void, even voidable waiting to be voided,**] judgments or sentences are considered in law as trespassers [in law (“Outlaws”)].

Elliott v Lessee of Piersol, 1828, 26 US (1 Pet.) 328, 340-341.

A void act ... may be attacked in any forum, state or federal, where its validity may be drawn in issue. *Pennoyer v Neff*, 1878, 95 US 714, 732-733, *World-Wide Volkswagen Corp. v. Woodson*, 444 US 286.

When rule providing for relief from void judgments is applicable, relief [**from Obstruction of Justice**] is *not a discretionary* matter, but is *mandatory* [for Outlaws to return to their prey their prey’s property held in *deemed constructive trust* for their prey’s benefit since day one (“**Mandatory Relief**”)].

Orner v Shalala, Colo. 1994, 30 F3d 1307.

- ⁸ A predator is a *predatory* traditionalist enjoying *territorial human rights* to injure and/or exploit others for *unlawful* gains and/or profits and *will not let* its untruthful thus illegal, unethical, immoral, unspiritual and unconstitutional ecology or environment insuring Obstruction of Justice *upgrade into* truthful thus legal, ethical, moral, spiritual and constitutional ecology or environment insuring Justice as it eradicates Obstruction of Justice from the face of our Mother Earth with all due thanks to our Father Time.

- ⁹ “No one shall be permitted to profit by his own fraud, or to take advantage of his own wrong, or to found any claim upon his own iniquity, or to acquire property by his own crime. These [**common lie sold as common law**] maxims are dictated by public policy, have their foundation in **universal law misapplied [to insure Obstruction of Justice]**. They were applied in the decision of the case of the New York *Mutual Life Insurance Company v Armstrong* ([1886, Field, J.], 117 US 591).

Riggs v Palmer, 1889, 115 NY 506, 511; *Imperator Realty Co v Tull*, 1920, **Cardozo**, 228 NY 447, 457. The Jun 11, 1963 *denial of restitution for rehabilitation* asked by a baby-in-fact who was *misjudged* as a bastard-in-law in the case of *Zepeda v Zepeda*, 1963, 41 Ill App2d 240 is **wrong awaiting correction**.

“... [262]... We [**men**] have decided to affirm the dismissal of the claim. We do this, *despite our designation of the wrong committed herein as a tort*, because of our *evil belief* that lawmaking, while inherent in the judicial process, should not be indulged in where the [**good**] **result could be as sweeping**. The interest of [263] society is so involved, the action needed to redress the tort could be **so far-reaching**, that the [**good**] policy of the State should be declared by [**local, state and federal lawmakers as**] the representatives of the people [who are *far, far more obsessed than us as judges with committing blasphemy failing to handle the truth and not end men’s irresistible evil love with their evil sexual addiction to risk-free illicit sex even with other men’s wives to corrupt genetic families with absolute immunity*].”

- ¹⁰ “...if two policemen see a rape and watch it just for their own amusement, no violation of the Constitution [**misapplied** to protect *sexual, lesexual and other predators’ rights* as Obstruction of Justice by laws *misapplied* and so *not make the predators pay their prey therapeutic restitution* for rehabilitation and prevention of *self-proving predation assassinating Justice* by laws *correctly applied*] ... (laughter)”.

May It Please the Court...Transcripts of 23 Live Recordings of Landmark Cases before the Supreme Court Available to the Public for the First Time, Edited by Peter Irons and Stephanie Guitton 1993, pp 39-60 at pp 46-47; Big Media made this Nov 2, 1988 law-breaking confession without correction law breaking news. Please hear (39:00 to 41:00 minutes) at <http://tinyurl.com/pnu9lrj> to believe this *predatory argument* by Chief Justice Rehnquist in *physical, not sexual, abuse* case of an infant son by its adult father *blessed* by the County the Journalist making journal entries in its archives.

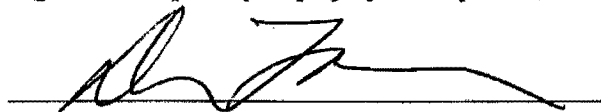
Let all Live in Truth Knowing Justice always Insures Nature.™

DEAN LOREN'S AFFIDAVIT DATED APRIL 23, 2018
IN SUPPORT OF MOTION FOR SIPC CLAIMS AGAINST BERNARD MADOFF
FOR THE BENEFIT OF POPE FRANCIS BEFORE JUDGE STUART BERNSTEIN AND
US HOUSE REPRESENTATIVES GOODLATTE, GOWDY, NUNES & HENSARLING
FOR FILING LATE SIPC CLAIMS.

I, DEAN LOREN, being duly sworn, depose and say that:

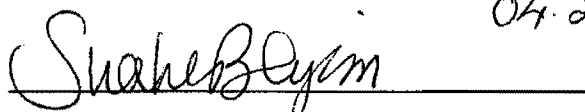
1. I am the Executor of the Evelyn Goldberg Estate ("Evelyn").
2. I have personal knowledge of the matters herein.
3. I am late in filing my SIPC Claims because:
 - a. My authority attached as Executor with Letters Testamentary on or After September 9, 2011 to the Estate after the SIPC filing date;
 - b. The SIPC Bernard L. Madoff Investment Securities LLC Client list was not sufficient to put me on notice of that Wolf Popper traded Simon Goldberg Estate assets for the benefit of the Evelyn Goldberg. See Exh 1, Loren's Affidavit in Support of SIPC Claims dated April 23 2018.
 - c. See my attached Affidavit in Support of Motion of SIPC Claims dated April 23, 2018 for my Exhibit 28 of fax correspondence to Trustee Picard on July 7, 2012;
 - d. That until 2015, the Simon A. Goldberg Estate had insufficient docketing due to fraud caused by Wolf Popper LLP. See Exh 27 Simon A. Goldberg Estate dated August 26, 2010 which only has about 10 documents on it..
 - e. After filing a 2015 IRS complaint, Surrogate Judge Mella sua sponte amended the docket in 2015 to include 190 additional documents necessary for SIPC claims to be assessed. See Exhibit 29 of Affidavit in Support of Motion of SIPC Claims that contains the Simon A. Goldberg Estate amended docket sheet date May 5, 2017 with the additional 190 documents.
 - f. Madoff's Depositions of 2016 in June and December were insufficient to give me notice.
 - g. However, the Madoff's Depositions of April 26 and 27, 2017, Exh 7 of Loren's Affid in support were sufficient to give Loren the proper notice for filing the SIPC claims with the disclosure of the 17th floor trading fraud.

Signed under penalty of perjury this April 23, 2018



Dean Loren, Executor, Evelyn Goldberg Estate

Sworn to before me this April 23, 2018



Notary Public

04.23.2018

SHAHIN S BHUIYAN
NOTARY PUBLIC, STATE OF NEW YORK
NO 01BH8114597
QUALIFIED IN QUEENS COUNTY
MY COMMISSION EXPIRES AUGUST 23, 2020

DEAN LOREN'S AFFIDAVIT DATED APRIL 23, 2018
IN SUPPORT OF MOTION FOR SIPC CLAIMS AGAINST BERNARD MADOFF
FOR THE BENEFIT OF POPE FRANCIS BEFORE JUDGE STUART BERNSTEIN AND
US HOUSE REPRESENTATIVES GOODLATTE, GOWDY, NUNES & HENSARLING

EXHIBIT LIST

PAGE	EXHIBIT	DESCRIPTION
0001	Affidavit	Dean Loren's Affidavit dated April 23, 2018 in support of motion for SIPC Claims
0010	Exhibit List	List of Exhibits
0013	1	Affid of John Franks with Exh A Client List Page 162 of 162, citing Wolf Popper LLC.
0019	2	Wolf Popper Billing from June 6, 1987 to March 3, 1985 and John C. Fisher thereafter to Current,
0045	3	Fraudulent Death Certificate of Simon A. Goldberg filed June 1, 1985 as a US Citizen
0048	4	July 2, 1985 Probate Petition 1985-3169 filed by Mandelbaum, citing Simon as a USA citizen
0055	5	Forged Simon and Evelyn 1985 Joint Tenancy Checks by David J. and Rosemary Mandelbaum
0059	6	June 23, 2017 Bloomberg News Big Four Reveal in Bernie Madoff by Erik Larson, reporter
0064	7	Nuveen Account created May 18, 1988, Page 1 of Transcript upper right hand corner heading
0122	8	Transcript Depositions of David J. Mandelbaum dated August 9, 1988, and August 16, 1988, citing to p 74 and p 159, respectively, Wolf Popper will not produce accounting records
0135	9	Simon A. Goldberg Death Certificates amended September 7, 1988 and October 19, 1988 for USA Citizenship and Simon A. Goldberg, respectively

Loren Affid dated April 23, 2018 - Exhibit List Continued

EXHIBIT LIST

PAGE	EXHIBIT	DESCRIPTION
0137	10	Bernard Madoff Deposition dated April 26, 2017, P11 Judge Bernstein Light Switch 1992 trading moment, P19-20 Treasuries Purchased, P75 Canadian Accounts
0149	11	Wolf Popper's filed Informal Accounting 1985-92 on behalf of Simon's Estate on February 13, 1993
0275	12	Wolf Popper Memo dated January 23, 1993 from John C. Fisher Partner to Emily Madoff (Bernie's cousin).
0277	13	1993 Canadian Ancillary Probate Petition P5 Affidavit of Mandelbaum dated April 14, 1993
0288	14	NY Post Jack Newfield, Court Patronage Favors an Elite Few published June 1, 1993
0290	15	GAL Judith Siegel Baum Billing Records from June 8, 1993 to October 16, 1995 (missing Evelyn apartment #/mail never delivered
0300	16	June 8, 1993 Fisher Letter to GAL Clerk Joseph Brown, Rm 301, noticed to Asst AG Howard Holt
0303	17	June 16, 1993 Accounting Department Clerk Order for Guardian Ad Litem over Evelyn Goldberg typed by Clerk James Gallagher
0305	18	Judith Siegel Baum acceptance of GAL appointment over Evelyn filed July 1, 1993
0308	19	Surrogate Judge Renee Roth June 30, 1993 Guardian ad Litem over Evelyn without a hearing
0310	20	Surrogate Roth Feb 24, 1995 Order to Conduct a conspiracy hearing on the Guardian ad Litem and Accounting

Loren Affid dated April 23, 2018 - Exhibit List Continued

EXHIBIT LIST

PAGE	EXHIBIT	DESCRIPTION
0315	21	Conspiracy Hearing Transcript for January 23, 1995, P26 On Hearings on Fraud and Transcript Admissions, PP 25-26
0322	22	June 1, 1995 Special Referee Karin Barkhorn Report on GAL Conspiracy and Constitutional Rights violations
0334	23	Wolf Popper Supplemental Accounting for Simon from January 1, 1993 to October 31, 1995
0427	24	Surrogate Judge Roth's December 28, 1995 Accounting Decree
0435	25	NY Post Editor Jack Newfield September 1, 1996, re GAL Judith Siegel Baum and others involved in the Wolf Popper Madoff Fraud in the Manhattan Surrogate Probate Court Patronage Policy
0437	26	Simon Estate June 27, 2011 Bounced check and Replacement check from Fisher/Wolf Popper
0441	27	Docket from Manhattan Surrogate Court dated August 26, 2010 with twenty-four entries
0443	28	July 7, 2012 fax from Loren to Picard re Emily Madoff and Wolf Popper